

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISON**

DOUGLAS JOHNSON,	)	
	)	
Plaintiff,	)	22 CV 3718
	)	
v.	)	Judge Robert W. Gettleman
	)	
COOK COUNTY SHERIFF THOMAS	)	
DART , in his official capacity,	)	
ANTWAUN BACON, a CCDOC officer,	)	
and COOK COUNTY, a municipal	)	
corporation,	)	
	)	
Defendants.	)	

**DEFENDANTS' JOINT OPPOSED MOTION FOR  
EXTENSION OF TIME  
FOR BRIEFING OF DISPOSITIVE MOTIONS**

NOW COME Defendants, ANTWAUN BACON, by and through his attorneys, Jason E. DeVore and Jorie R. Johnson, of DeVore Radunsky LLC, and COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Joint Opposed Motion for Extension of Time for Briefing of Dispositive Motions, state as follows:

1. This is Defendant second request for an extension of time for briefing of dispositive motions.
2. Counsels for all parties have been in communication regarding this Motion and Counsels for Plaintiff have made their intended opposition clear.
3. On January 14, 2025, this Court issued an Order setting the following dispositive motion schedule: Motions due by March 14, 2025; Responses due by April 11, 2025, and Replies due by April 25, 2025. (ECF No. 72.)
4. Then on March 3, 2025, this Court granted Defendants' Joint Opposed Motion for Extension of Time for Briefing of Dispositive Motions resetting the dispositive

motion schedule to the following: Defendants' motions for summary judgment due by 5/9/2025; plaintiff's responses due by 6/6/2025; defendants' replies due by 6/20/2025. (ECF No. 74.)

5. Defendants have met and jointly agree that additional time is needed to draft their dispositive motions.
6. Counsel for Defendant ANTWAN BACON has been heavily involved in extensive discovery across multiple cases over the past several weeks. As a result, counsel is scheduled to participate in numerous fact and Rule 30(b)(6) depositions, along with at least two contested hearings in the coming weeks. Additionally, counsel is set to appear for a seven-day trial beginning on the same day this brief is due to be filed by Defendants.
7. Accordingly, the parties now request a 35 (Thirty-Five) day extension to all deadlines, up to and including the following dates: Motions due by June 13, 2025; Responses due by July 11, 2025, and Replies due by July 25, 2025.
8. Under Rule 6(b), this Court may, for good cause, extend the time “[w]hen an act may or must be done.” Fed. R. Civ. P. 6(b).
9. Not granting the requested extensions of time would prejudice the parties because the current deadlines will not allow sufficient time to properly prepare and submit their briefs.
10. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. Defendants' Motion for Extension of Time is granted;

2. Dispositive Motions due by June 13, 2025; Responses due by July 11, 2025, and Replies due by July 25, 2025.
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

**Defendants**

By: /s/ Jason E. DeVore  
Jason E. DeVore, One of the Attorneys  
for Defendants

**DEVORE RADUNSKY LLC**

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that the above Opposed Motion for Extension of Time was filed on April 21, 2025, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/ Jason E. DeVore  
Jason E. DeVore,